

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEFINITION SERVICES INC., a British Virgin Islands corporation,)
Plaintiff,)
v.) C.A. No. 1:21-cv-00741-MN-JLH
GVA CAPITAL LTD., a Cayman Islands exempted company)
Defendant.)

STIPULATION AND [PROPOSED] ORDER STAYING PROCEEDINGS FOR 30 DAYS

WHEREAS, on October 27, 2022, the Court entered a Scheduling Order in this matter (D.I. 85);

WHEREAS, on February 7, 2023, Plaintiff Definition Services Inc. (“Definition”) moved for a temporary stay of the proceedings due to its temporary inability to pay counsel (D.I. 90-92);

WHEREAS, Defendant GVA Capital Ltd. (“GVA”) opposed Definition’s motion for a temporary stay (D.I. 93) and the Court scheduled oral argument on Definition’s motion for April 3, 2023 at 3:00 PM (D.I. 97); and

WHEREAS, the parties have since engaged in discussions regarding potential efforts to resolve the disputes at issue in this litigation and are now in agreement that a temporary stay of proceedings of thirty (30) days is warranted to provide the opportunity for such discussions to occur;

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Definition and GVA, subject to the approval of the Court, that:

- (1) This matter is temporarily stayed for a period of thirty (30) days;
- (2) The oral argument scheduled for April 3, 2023 is postponed for thirty (30) days to a

date convenient for the Court and counsel;

- (3) All pre-trial deadlines in the October 27, 2022 Scheduling Order are adjourned pending entry of an amended scheduling order by the Court;
- (4) At least seven (7) days before the expiration of the temporary thirty-day stay, the parties shall file a joint status letter advising the Court on their respective positions as to whether a further stay of the proceedings is appropriate; and
- (5) The parties shall appear for a telephonic status conference before the undersigned on May 2, 2023 at 3:00 pm.

Dated: March 28, 2023

PASHMAN STEIN WALDER HAYDEN, P.C. DLA PIPER LLP (US)

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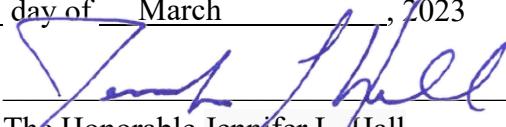
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GVA Capital Ltd.

IT IS SO ORDERED this 28th day of March, 2023


The Honorable Jennifer L. Hall
United States Magistrate Judge